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REPLY BRIEF OF APPELLANT

This Reply Brief is in reply to the Examiner's Answer mailed February 4, 2009.

ARGUMENT

GROUND OF REJECTION 1

Claims 23-25 and 27-32 stand rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by United States Patent No. 6,453,353 to Win et al., hereinafter Win.

Claim 23

Appellants respectfully contend that Win does not anticipate claim 23, because Win does not teach each and every feature of claim 23.

As a first example of why Win does not anticipate claim 23, Win does not teach the feature: “receiving a request from a user device via a network for a virtual ID token relating to attribute information pertaining to a subscriber associated with the user device”.

The language of claim 23 explicitly recites that the virtual ID token provided to the user device *comprises a virtual ID for identifying a virtual record* that includes M attributes of a subscriber associated with a user device (M is less than at least 2).

The assertion in the Examiner’s Answer that the claimed virtual ID token comprises attribute information (see Examiner’s Answer, page 10, bottom line) is not recited anywhere in claim 23 and is thus incorrect. Rather than reciting that the virtual ID token *comprises* attribute information, claim 23 recites that the virtual ID token *relates to* attribute information pertaining to a subscriber by comprising a virtual ID for identifying a virtual record that includes M attributes of the subscriber.

Thus, the preceding feature of claim 23 requires receiving a request from a user device for a virtual ID token that comprises a virtual ID for identifying a virtual record that includes M attributes of a subscriber associated with a user device, which Win does not teach.

The Examiner's Answer, page 3, lines 7-9 alleges that Win, Figs. 5A and 5C, and col. 2, lines 42-67 teaches the preceding feature of claim 23, which is incorrect.

In response, Appellants assert that Win, col. 2, lines 42-67 does not teach receiving a request for a virtual ID token that comprises a virtual ID for identifying a virtual record that includes M attributes of a subscriber associated with a user device. Appellants note that the preceding argument in the Examiner's Answer has not provided any analysis to support the allegation in the Examiner's Answer that Win, Figs. 5A and 5C , and col. 2, lines 42-67 teaches the preceding feature of claim 23.

The Examiner's Answer, page 310, line 13 - page 311, line 18 additionally argues that Win teaches the preceding feature of claim 23, which is incorrect. In particular, the Examiner's Answer, page 310, line 13 - page 311, line 18 discusses at great length what the Examiner's Answer consider a virtual ID token to be, but does not address the issue of "*receiving a request* from a user device ... for a virtual ID token". Appellants cannot find a teaching of *receiving a request* from a user device for a virtual ID token in the citations recited in the Examiner's Answer, page 310, line 13 - page 311, line 18.

In addition, Appellants cite Win, col. 10, lines 45-47 which recites: "the Authorization service requests profile information about the user from the Registry Server 108", which does not teach the preceding feature of claim 23 because: (1) the request for profile information is not a request for a virtual ID token that comprises a virtual ID for identifying a virtual record that includes M attributes of a subscriber associated with a user device; and/or (2) the request is not

from a user device but rather is from the Registry Server 108. For clarification, Appellants refer to Win, FIG. 1 which depicts a user device in association with the browser 100. The Registry Server 108 in Win, FIG. 1 is not a user device.

In summary, Appellants cannot find a disclosure anywhere in Win of “*receiving a request* from a user device ... for a virtual ID token” (wherein the virtual ID token comprises a virtual ID for identifying a virtual record that includes M attributes of a subscriber associated with a user device).

As an additional point, Appellants note that the Examiner’s Answer, page 10, lines 19-21 asserts that “the Appellant’s Specification does not further define as to what the “virtual ID token” is, but rather its composition”.

In response, Appellants assert that the virtual ID token is not required to be defined, because the word “token” is very well known and commonly used in patents. In fact, Appellants’ Representative did a search of “token” at the United States Patent and Trademark Office database on July 30, 2009 with a result of 30,245 hits. A word so commonly used in patents as “token” is not required to be specifically defined in a patent, and what is most important for patentable significance is what the claimed virtual ID token actually comprises, namely a virtual ID for identifying a virtual record that includes attributes of a subscriber associated with a user device.

Accordingly, Win does not teach the preceding feature of claim 23.

As a second example of why Win does not anticipate claim 23, Win does not teach the feature: “*responsive to the request for the virtual ID token*, reading a data record from a

database, said data record comprising L attributes of the subscriber, L being at least 2" (emphasis added).

The Examiner's Answer, page 3, lines 10-12 argues that Win teaches the preceding feature of claim 23 in Win, Figures 5a, 5b and 5e, column 10, lines 14-26 and 41-55, column 11 and lines 42-64.

In response and based on the discussion in the Examiner's Answer, page 11, line 19 - page 12, line 9, Appellants view the Examiner's Answer as alleging that Win teaches the preceding feature of claim 23 in FIG. 5C, step 520 as described in Win, col. 10, lines 41-55.

Accordingly, Appellants specifically cite Win, col. 10, lines 43-51 which recites: "*After a user is authenticated*, the Authentication Client module 414 calls the Authorization service of Access Server 106. In response, the Authorization service requests profile information about the user from the Registry Server 108, as shown by state 520. In state 522, Registry Server 108 returns the profile information to Access Server 106. The profile information may comprise the user's name, locale information, IP address, and information defining roles held by the user."

(emphasis added)

Appellants respectfully contend that the preceding quote from Win, col. 10, lines 43-51 discloses that the reading of a data record from a database (said data record comprising attributes of the subscriber) is responsive to the user being authenticated., and does not disclose that the reading of a data record from a database is "responsive to the request for the virtual ID token" as required by the language of the preceding feature of claim 23.

Accordingly, Win does not teach the preceding feature of claim 23.

As a third example of why Win does not anticipate claim 23, Win does not teach the feature: "providing the data record to the user device via the network".

The Examiner's Answer, page 3, lines 13-19 argues: "Win teaches ... providing the data record to the user device via the network (Figures 1, 2 and 6-8, column 5, lines 1-12 and column 26, lines 14-67, "remote computer can load the instructions into its dynamic memory and send the instructions over a telephone line via modem" "Communication interface 918 provides a two-way data communication coupling to a network link 920 that is connected to a local network 922" and "Network link 920 typically provides data communication through one or more networks to other data devices")".

In response, Appellants assert that the preceding quote from Win by the Examiner's Answer is taken from a discussion of a generic computer system. This discussion of a generic computer system does not teach "providing the data record to the user device via the network" wherein the "data record" is the same data record as appears in the feature of "reading a data record from a database", namely a data record comprising profile information of the user.

The Examiner's Answer, page 12, lines 10-21 additionally argues that Win also discloses the preceding feature of claim 23 in Win, col. 5, line 66 - col. 6, lines 16 and col. 6, lines 58-65, and col. 26, lines 14-67.

In response, Appellants assert that Win, col. 5, line 66 - col. 6 comprises a general discussion about logging in to a system which is unrelated to the preceding feature of claim 23.

In further response, Appellants assert that Win, col. 6, lines 58-65 comprises a general discussion about cookies which is unrelated to the preceding feature of claim 23.

In yet further response, Appellants assert that Win, col. 26, lines 14-67 comprises a general discussion about the generic computer system of Win, FIG. 9 which is unrelated to the preceding feature of claim 23.

Accordingly, Win does not teach the preceding feature of claim 23.

As a fourth example of why Win does not anticipate claim 23, Win does not teach the feature: "receiving, from the user device via the network, a selection of M attributes of the L attributes, M being less than L".

The Examiner's Answer, page 3, line 20 - page 4, line 4 argues: "Win teaches ... receiving, from the user device via the network, a selection of M attributes of the L attributes, M being less than L (Figure 10b, column 26, lines 14-67, "remote computer can load the instructions into its dynamic memory and send the instructions over a telephone line via a modem" "Communication interface 918 provides a two-way data communication coupling to a network link 920 that is connected to a local network 922" and "Network link 920 typically provides data communication through one or more networks to other data devices")".

In response, Appellants note that the preceding argument in the Examiner's Answer has not specifically identified in Win: the M attributes selected from the data record, which makes the argument in the Examiner's Answer vague and unclear. The Examiner's Answer has not even identified the data record in Win. Appellants assert that the preceding quote from Win, col. 26, lines 14-67 by the Examiner's Answer is taken from a discussion of a discussion of a generic computer system that is totally silent as to the claimed "selection of M attributes of the L attributes, M being less than L".

The Examiner's Answer, page 13, lines 1-18 additionally argues: "The Examiner's Answer asserts that Win discloses this claimed feature, as cited above and further in view of column 3, lines 7-25, "the receiving step further comprises the steps of storing, in a database accessible by the Web application server, information describing one or more roles and one or more access rights of the user that are stored in association with user identifying information, wherein the roles represent the work responsibilities carried out by the user in the enterprise, and wherein the access rights represent the kinds and levels of access privileges that are held by the user in the enterprise". The "one or more roles and one or more access rights of the user" are received and are "in association with user identifying information". The "user identifying information" isn't sent along with said "roles" or "access rights", thus said "roles" and "access rights" would be the claimed "M attributes".... Further, within column 6, lines 41-54, a "name and password" are given to an "Authentication Client Module" for verification purposes. Those two pieces of information constitute "attributes" and since only those two pieces are given and not additional information (i.e. roles), the claimed "M attributes" are disclosed by said "name and password" as well."

In response, Appellants assert that the preceding citation to Win, col. 3, lines 7-25 discloses storing of information in a database accessible by the Web application server, but does not disclose receiving a selection of attributes from the user device as required by the language in the preceding feature of claim 1. Furthermore, there is no language in Win, col. 3, lines 7-25 that recites the negative limitation of roles information not being stored in the database, which the Examiner's Answer, page 13, lines 1-18 relies upon.

Accordingly, Win does not teach the preceding feature of claim 23.

As a fifth example of why Win does not anticipate claim 23, Win does not teach the feature: "generating a virtual record including the M attributes selected from the data record, said virtual record comprising a virtual ID (VID) for identifying the virtual record".

The Examiner's Answer, page 4, lines 5-10 argues that Win teaches the preceding feature of claim 23 in Win, Figures 10a-10c, column 12, lines 32-55 and column 15, lines 35-52.

In response, Appellants assert that the preceding argument in the Examiner's Answer has not specifically identified which content in Win, Figures 10a-10c, column 12, lines 32-55 and column 15, lines 35-52 allegedly represents the claimed virtual record and the allegedly included virtual ID and M attributes. Therefore, Appellants cannot evaluate the preceding argument in the Examiner's Answer, especially since the M attributes in the virtual record are required by the language of claim 23 to be the same M attributes received from the user device. Therefore, the preceding argument by the Examiner's Answer is not persuasive.

The Examiner's Answer, page 13, line 19 - page 14, line 5 additionally argues: "The Examiner maintains the above-cited grounds of rejection and further states that Win additionally discloses the claimed invention within column 10, lines 41-55, "profile information may comprise the user's name, locale information, IP address, and information defining roles held by the user". Said "profile" being the Appellant's claimed "virtual record"."

In response, Appellant assert that the preceding feature of claim 23 explicitly recites that the generated virtual record comprises a virtual ID for identifying the virtual record, which Win does not teach and which the Examiner's Answer has not addressed.

Accordingly, Win does not teach the preceding feature of claim 23.

As a sixth example of why Win does not anticipate claim 23, Win does not teach the feature: "storing the generated virtual record in the database".

The Examiner's Answer, page 4, lines 8-11 argues: "Win teaches ... storing the generated virtual record in the database (column 3, lines 7-40, "storing, in the database an association of each resource to one or more of the roles", column 5, lines 13-20, column 12, lines 32-55 and column 15, lines 35-52)".

In response, Appellants assert that the preceding argument in the Examiner's Answer ignores the requirement explicitly recited in claim 23 that the generated virtual record comprises a virtual ID for identifying the virtual record and is thus not persuasive.

The Examiner's Answer, page 14, lines 6-18 provides additional argumentation but still fails to indicate where Win allegedly discloses storing a generated virtual ID record that comprises a virtual ID for identifying the virtual record, which is required explicitly by the language in claim 23.

Accordingly, Win does not teach the preceding feature of claim 23.

As a seventh example of why Win does not anticipate claims 23, Win does not teach the feature: "providing the virtual ID token to the user device via the network, wherein the virtual ID token comprises the VID".

The Examiner's Answer, page 4, lines 11-18 argues: "Win teaches ... providing the virtual ID token to the user device via the network, wherein the virtual ID token comprises the VID (Figures 1, 2 and 6-8, column 2, lines 42-67, column 5, lines 1-12 and column 26, lines 14-67, "remote computer can load the instructions into its dynamic memory and send the instructions over a telephone line via a modem" "Communication interface 918 provides a

two-way data communication coupling to a network link 920 that is connected to a local network 922" and "Network link 920 typically provides data communication through one or more networks to other data devices"”.

In response, Appellants assert that the preceding quote from Win by the Examiner's Answer is taken from a discussion of a generic computer system which does not teach providing to the user the virtual ID token that comprises a virtual ID for identifying the virtual record.

The Examiner's Answer, page 14, line 19 - page 15, line 19 provides additional argumentation but still fails to indicate where Win allegedly discloses providing to the user the virtual ID token that comprises a virtual ID for identifying the virtual record, which is explicitly required by the language of claim 23.

Accordingly, Win does not teach the preceding feature of claim 23.

As an eighth example of why Win does not anticipate claim 23, Win does not teach the feature: "wherein an attribute information providing server performs said receiving the request for the virtual ID token, said reading the data record from the database, said providing the data record to the user device, said receiving the selection of M attributes, said generating the virtual record, said storing the generated virtual record in the database, and said providing the virtual ID token to the user device"”.

The Examiner's Answer, page 4, line 19, page 5, line 4 argues: "Win teaches ... wherein an attribute information providing server performs said receiving the request for the virtual ID token, said reading the data record from the database, said providing the data record to the user device, said receiving the selection of M attributes, said generating the virtual record, said storing the generated virtual record in the database, and said providing the virtual ID token to the

user device (column 3, lines 7-40, "storing, in the database an association of each resource to one or more of the roles", column 5, lines 13-20, column 11, lines 42-64, column 12, lines 32-55 and column 15, lines 35-52)."

In response, Appellants assert that the preceding argument in the Examiner's Answer has not properly addressed the preceding feature of claim 23. In particular, the Examiner's Answer has not identified an attribute information providing server (or any other server) that performs all of the recited steps (i.e., the steps of "said receiving the request for the virtual ID token, said reading the data record from the database, said providing the data record to the user device, said receiving the selection of M attributes, said generating the virtual record, said storing the generated virtual record in the database, and said providing the virtual ID token to the user device"). Therefore, the argument in the Examiner's Answer is not relevant to the preceding feature of claim 23 and is therefore not persuasive.

The Examiner's Answer, page 14, line 19 - page 15, line 19 provides additional argumentation but still fails to indicate where Win allegedly discloses a server that performs all of the recited steps (i.e., the steps of "said receiving the request for the virtual ID token, said reading the data record from the database, said providing the data record to the user device, said receiving the selection of M attributes, said generating the virtual record, said storing the generated virtual record in the database, and said providing the virtual ID token to the user device").

Accordingly, Win does not teach the preceding feature of claim 23.

Based on the preceding arguments, Appellants respectfully maintain that Win does not anticipate claim 23, and that claim 23 is in condition for allowance. Since claims 24, 25 and 27-

32 depend from claim 23, Appellants contend that claims 24, 25 and 27-32 are likewise in condition for allowance.

Claim 24

Since claim 24 depends from claim 23, which Appellants have argued *supra* to not be anticipated by Win under 35 U.S.C. §102(e), Appellants maintain that claim 24 is likewise not anticipated by Win under 35 U.S.C. §102(e).

In addition with respect to claim 24, Win does not teach the feature: “receiving a request comprising the VID for attribute information associated with the VID from an attribute information receiving apparatus via the network”. Appellants assert that claim 23, from which claim 24 depends, requires the virtual ID to identify a virtual record that includes attributes of the subscriber.

The Examiner’s Answer, page 5, lines 5-8 argues: “Win teaches receiving a request comprising the VID for attribute information associated with the VID from an attribute information receiving apparatus via the network (Figures 10a-10c, column 12, lines 32-55 and column 15, lines 35-52)”.

In response, Appellants note that the Examiner’s Answer has not identified specifically what allegedly represents the VID in Win which makes the argument in the Examiner’s Answer vague and unclear.

Appellants respectfully contend that Win, Figures 10a-10c, col. 12, lines 32-55 and col. 15, lines 35-52 does not mention anything about a VID.

In addition, Appellants respectfully contend that Win, Figures 10a-10c, col. 12, lines 32-55 and col. 15, lines 35-52 does not mention anything about receiving a request comprising the VID

In addition, Appellants respectfully contend that Win, Figures 10a-10c, col. 12, lines 32-55 and col. 15, lines 35-52 does not mention anything about receiving a request comprising the VID for attribute information associated with the VID.

In addition, Appellants respectfully contend that Win, Figures 10a-10c, col. 12, lines 32-55 and col. 15, lines 35-52 does not mention anything about receiving a request comprising the VID for attribute information associated with the VID from an attribute information receiving apparatus via the network.

Thus, the preceding argument in the Examiner's Answer has not persuasively supported the allegation in the Examiner's Answer with respect to Win's alleged teaching of the preceding feature of claim 24.

The Examiner's Answer, page 16, line 13 - page 17, line 2 provides additional argumentation, but still fails to provide a citation in Win that allegedly teaches receiving a request comprising the VID for attribute information associated with the VID, wherein the VID in the request identifies a virtual record that includes attributes of the subscriber.

Accordingly, Win does not teach the preceding feature of claim 24.

In addition with respect to claim 24, Win does not teach the feature: "reading the virtual record from the database in response to the request comprising the VID".

The Examiner's Answer, page 5, lines 9-12 argues: "Win teaches ... reading the virtual record from the database in response to the request comprising the VID (column 3, lines 7-40,

"storing, in the database an association of each resource to one or more of the roles", column 5, lines 13-20, column 11, lines 42-64, column 12, lines 32-55 and column 15, lines 35-52).

In response, Appellants assert that the Examiner's Answer has erroneously equated "storing" a record to "reading" a record. Therefore, the Examiner's Answer's argument is illogical.

The Examiner's Answer, page 17, lines 3-10 provides additional argumentation, but still fails to appreciate the difference between "storing" a record and "reading" a record.

In addition, the Win does not teach that reading the virtual record is in response to the request comprising the VID, which the Examiner's Answer has not even addressed.

Accordingly, Win does not teach the preceding feature of claim 24.

In addition with respect to claim 24, Win does not teach the feature: "after said reading, providing the virtual record to the attribute information receiving apparatus via the network".

The Examiner's Answer, page 5, lines 13-20 argues: "Win teaches ... after said reading, providing the virtual record to the attribute information receiving apparatus via the network (Figures 1, 2 and 6-8, column 2, lines 42-67, column 5, lines 1-12 and column 26, lines 14-67, "remote computer can load the instructions into its dynamic memory and send the instructions over a telephone line via a modem" "Communication interface 918 provides a two-way data communication coupling to a network link 920 that is connected to a local network 922" and "Network link 920 typically provides data communication through one or more networks to other data devices")".

In response, Appellants assert that the Examiner's Answer has not specifically identified in Win the claimed virtual record. Therefore, the argument in the Examiner's Answer is vague

and unclear. In fact, the argument in the Examiner's Answer does not even address the virtual record in the preceding feature of claim 24.

The Examiner's Answer, page 17, line 11 - page 18, line 2 provides additional argumentation pertaining to cookies in a generic computer system, which is unrelated to the preceding feature of claim 24.

Accordingly, Win does not teach the preceding feature of claim 24.

In addition with respect to claim 24, Win does not teach the feature: "wherein the attribute information providing server performs said receiving the request comprising the VID, said reading the virtual record from the database, and said providing the virtual record to the attribute information receiving apparatus".

The Examiner's Answer, page 5, line 21 - page 6, line 4 argues: "Win teaches ... wherein the attribute information providing server performs said receiving the request comprising the VID, said reading the virtual record from the database, and said providing the virtual record to the attribute information receiving apparatus (column 2, lines 42-67, column 3, lines 7-40, "storing, in the database an association of each resource to one or more of the roles", column 5, lines 13-20, column 12, lines 32-55 and column 15, lines 35-52)".

In response, Appellants assert that the Examiner's Answer has not properly addressed the preceding feature of claim 24. In particular, the Examiner's Answer has not identified an attribute information providing server (or any other server) that performs the recited steps of "said receiving the request comprising the VID, said reading the virtual record from the database, and said providing the virtual record to the attribute information receiving apparatus".

Therefore, the argument in the Examiner's Answer is not relevant to the preceding feature of claim 24 and is therefore not persuasive.

The Examiner's Answer, page 17, lines 3-10 provides additional argumentation, but still fails to address the preceding feature of claim 24 with respect to disclosing an attribute information providing server (or any other server) that performs the recited steps of "said receiving the request comprising the VID, said reading the virtual record from the database, and said providing the virtual record to the attribute information receiving apparatus".

Accordingly, Win does not teach the preceding feature of claim 24.

Claim 25

Since claim 25 depends from claim 23, which Appellants have argued *supra* to not be anticipated by Win under 35 U.S.C. §102(e), Appellants maintain that claim 25 is likewise not anticipated by Win under 35 U.S.C. §102(e).

In addition with respect to claim 25, Win does not teach the feature: "wherein said providing the virtual record to the attribute information receiving apparatus is performed in manner that ensures that the virtual ID is concealed from the attribute information receiving apparatus when the virtual record is received by the attribute information receiving apparatus".

The Examiner's Answer, page 6, lines 5-10 argues: "Regarding claim 25, Win teaches wherein said providing the virtual record to the attribute information receiving apparatus is performed in manner that ensures that the virtual ID is concealed from the attribute information receiving apparatus when the virtual record is received by the attribute information receiving apparatus (Figures 3b, 3c, 4, 5a-5e and 6, column 6, lines 41-54, column 8, lines 23-63, column 9, lines 41-60 and column 10, lines 41-63)."

In response, Appellants assert that the Examiner’s Answer has not specifically identified in Win the claimed virtual record. Therefore, the argument in the Examiner’s Answer is vague and unclear.

In addition, the Examiner’s Answer has provided no analysis to demonstrate that Win (Figures 3b, 3c, 4, 5a-5e and 6, column 6, lines 41-54, column 8, lines 23-63, column 9, lines 41-60 and column 10, lines 41-63) teaches the preceding feature of claim 25. In particular, the Examiner’s Answer has not identified the virtual record, the virtual ID, the attribute information receiving apparatus, and concealment of the virtual ID from the attribute information receiving apparatus when the virtual record is received by the attribute information receiving apparatus.

The preceding argument by the Examiner’s Answer has not persuasively supported the allegation in the Examiner’s Answer with respect to Win’s alleged teaching of the preceding feature of claim 25.

The Examiner’s Answer, page 19, lines 1-13 provides additional argumentation related to encrypting and decrypting cookies, which is unrelated to the preceding feature of claim 25.

Accordingly, Win does not teach the preceding feature of claim 25.

Claim 27

Since claim 27 depends from claim 23, which Appellants have argued *supra* to not be anticipated by Win under 35 U.S.C. §102(e), Appellants maintain that claim 27 is likewise not anticipated by Win under 35 U.S.C. §102(e).

In addition with respect to claim 27, Win does not teach the feature: “after said providing the virtual record to the attribute information receiving apparatus: providing, by the attribute information providing server, an attribute certificate to the attribute information receiving

apparatus in relation to a new transaction between the subscriber and the attribute information receiving apparatus, wherein the attribute certificate pertains to the M attributes in the virtual record provided to the attribute information receiving apparatus”

The Examiner’s Answer, page 6, lines 11-18 argues: “Regarding claim 27, Win teaches after said providing the virtual record to the attribute information receiving apparatus: providing, by the attribute information providing server, an attribute certificate to the attribute information receiving apparatus in relation to a new transaction between the subscriber and the attribute information receiving apparatus, wherein the attribute certificate pertains to the M attributes in the virtual record provided to the attribute information receiving apparatus (column 5, lines 66 and 67, column 6, lines 1-9, column 17, lines 28-37, column 19, lines 56-63 and column 22, lines 41-46).”

In response, Appellants assert that the preceding argument in the Examiner’s Answer has not specifically identified in Win: the attribute information providing server, the attribute certificate, and the M attributes in the virtual record. Therefore, the argument in the Examiner’s Answer is vague and unclear.

Moreover, the Examiner’s Answer has not provided any analysis to demonstrate the Win (column 5, lines 66 and 67, column 6, lines 1-9, column 17, lines 28-37, column 19, lines 56-63 and column 22, lines 41-46) teaches the preceding feature of claim 27.

The Examiner’s Answer, page 19, line 14 - page 20, line 8 additionally argues: “The Examiner asserts that Win discloses this claimed feature as cited within column 5, lines 66 and 67, column 6, lines 1-9, “Users may log in either with a digital certificate by opening a login page URL with a web browser and entering a name and password”, column 17, lines 28-37, column 19, lines 56-63, “Remote procedure calls to Registry Server 108 are authenticated using

digital certificates, encrypted, and encapsulated within HTTP transactions" and column 22, lines 41-46, "Access Server 106 and Registry Server 108 exchange digital certificates over encrypted link 109. The digital certificates are used during the SSL handshake for mutual authentication. Remote procedure calls from Access Server 106 to Registry Server 108 are then sent over an encrypted HTTP/SSL session"."

In response, Appellants assert that the preceding argument in the Examiner' Answer is a generic discussion of digital certificates which does not address the claimed feature of "wherein the attribute certificate pertains to the M attributes in the virtual record provided to the attribute information receiving apparatus" and is thus not persuasive.

Accordingly, Win does not teach the preceding feature of claim 27.

Claim 28

Since claim 28 depends from claim 23, which Appellants have argued *supra* to not be anticipated by Win under 35 U.S.C. §102(e), Appellants maintain that claim 28 is likewise not anticipated by Win under 35 U.S.C. §102(e).

In addition with respect to claim 28, Win does not teach the feature: "wherein the attribute information providing server comprises: a customer record display unit for displaying the virtual record; an attribute selection unit for extracting the M attributes from the data record prior to said generating the virtual record; a virtual record generation unit for performing said generating the virtual record; a VID token issue unit for performing generating the virtual ID token prior to said providing the virtual token ID to the user device; a virtual record referencing unit for referencing the virtual record based on the VID prior to said providing the virtual record

to the attribute information receiving apparatus; and a virtual record issue unit for performing said providing the virtual record to the attribute information receiving apparatus".

The Examiner's Answer, page 6, line 19 - page 7, line 20 argues: "Regarding claim 28, Win teaches wherein the attribute information providing server comprises: a customer record display unit for displaying the virtual record (Figures 10a-10c, column 17, lines 52-67 and column 18, lines 14-27); an attribute selection unit for extracting the M attributes from the data record prior to said generating the virtual record (Figures 10a-10c, column 12, lines 32-55, column 15, lines 35-52 and column 16, lines 13-58); a virtual record generation unit for performing said generating the virtual record (Figures 10a-10c, column 12, lines 32-55, column 15, lines 35-52 and column 16, lines 13-58); a VID token issue unit for performing generating the virtual ID token prior to said providing the virtual token ID to the user device (Figures 5a, 5b and 5e, column 2, lines 42-67, column 10, lines 14-26 and 41-55, column 11 and lines 42-64); a virtual record referencing unit for referencing the virtual record based on the VID prior to said providing the virtual record to the attribute information receiving apparatus (Figures 10a-10c, column 12, lines 32-55, column 15, lines 35-52 and column 16, lines 13-58); and a virtual record issue unit for performing said providing the virtual record to the attribute information receiving apparatus (Figures 1, 2 and 6-8, column 2, lines 42-67, column 5, lines 1-12 and column 26, lines 14-67, "remote computer can load the instructions into its dynamic memory and send the instructions over a telephone line via a modem" "Communication interface 918 provides a two-way data communication coupling to a network link 920 that is connected to a local network 922" and "Network link 920 typically provides data communication through one or more networks to other data devices")."

In response, Appellants assert that the Examiner's Answer has not specifically identified in Win: the customer record display unit, the virtual record generation unit, the VID token issue unit; the virtual record referencing unit for referencing the virtual record based on the VID prior to said providing the virtual record to the attribute information receiving apparatus, and the virtual record issue unit. Therefore, the argument in the Examiner's Answer is vague and unclear.

Moreover, the Examiner's Answer has not provided any analysis to demonstrate the preceding citations Win teach the preceding feature of claim 28.

Thus, the Examiner's preceding argument in the Answer has not persuasively supported the allegation in the Examiner's Answer with respect to Win's alleged teaching of the preceding feature of claim 28.

The Examiner's Answer, page 20, line 9 - page 22, line 14 provides lengthy additional argumentation that fails to provide clear and concise statements concerning what allegedly represents each claimed component of the attribute information providing server. Appellants consider the argument in the Examiner's Answer, page 20, line 9 - page 22, line 14 to be cumbersome and to include too much irrelevant content to be reasonably understood.

Accordingly, Win does not teach the preceding feature of claim 28.

Claim 29

Since claim 29 depends from claim 23, which Appellants have argued *supra* to not be anticipated by Win under 35 U.S.C. §102(e), Appellants maintain that claim 29 is likewise not anticipated by Win under 35 U.S.C. §102(e).

In addition with respect to claim 29, Win does not teach the feature: "wherein the VID token further comprises a URL of the attribute information providing server".

The Examiner's Answer, page , line 21 - page 8, line 2 argues: "Regarding claim 29, Win teaches wherein the VID token further comprises a URL of the attribute information providing server (Figures 3a-3c, column 5, lines 13-21, 66 and 67, column 6, lines 1-9 and 58-65, column 7, lines 45-57, column 8, lines 5-63 and column 14, lines 34-43 and 56-67)."

In response, Appellants assert that the preceding argument in the Examiner's Answer does not include any analysis to demonstrate the preceding citations Win teach the preceding feature of claim 29.

The Examiner's Answer, page 22, line 15 - page 23, line provides the following additional argumentation: "The Examiner maintains that Win discloses this claimed feature, as disclosed within column 5, lines 13-21, 66 and 67, column 6, lines 1-9 and 58-65, column 7, lines 45-57, "administrator enters, for each Protected Server 104, an identifier; a name; a protocol; a port; a description; *the location of an authentication server*, URLs that identify pages displayed upon logout, upon login, and where restricted resources are encountered; the Protected Server on which cookies are stored", column 8, lines 5-63, "Open the Resource designated by this URL" and column 14, lines 34-43, "Each resource is defined by a resource identifier value, a resource name, a description, a Web server, a Relative URL, and a list of protected resources" and lines 56-67."

In response, Appellants assert that the preceding argument in the Examiner's Answer has not even addressed the requirement of claim 29 that the VID token (that comprises the VID that identifies the virtual record that includes attributes of the subscriber) comprises a URL of the attribute information providing server.

Accordingly, Win does not teach the preceding feature of claim 29.

Claim 31

Since claim 31 depends from claim 23, which Appellants have argued *supra* to not be anticipated by Win under 35 U.S.C. §102(e), Appellants maintain that claim 31 is likewise not anticipated by Win under 35 U.S.C. §102(e).

In addition with respect to claim 31, Win does not teach the feature: "receiving a selection of M1 attributes of the L attributes in the data record, wherein the M1 attributes are not identical to the M attributes".

The Examiner's Answer, page 8, lines 6-15 argues: "Regarding claim 31, Win teaches receiving a selection of M1 attributes of the L attributes in the data record, wherein the M1 attributes are not identical to the M attributes (Figure 10b, column 3, lines 7-40, "storing, in the database an association of each resource to one or more of the roles", column 5, lines 13-20, column 11, lines 42-64, column 12, lines 32-55, column 15, lines 35-52 and column 26, lines 14-67, "remote computer can load the instructions into its dynamic memory and send the instructions over a telephone line via a modem" "Communication interface 918 provides a two-way data communication coupling to a network link 920 that is connected to a local network 922" and "Network link 920 typically provides data communication through one or more networks to other data devices")"

In response, Appellants note that the Examiner's Answer has not specifically identified the M1 attributes and the M attributes of the L attributes in the data record. Therefore, the argument in the Examiner's Answer is vague and unclear.

Moreover, the Examiner's Answer has not provided any analysis to demonstrate the preceding citations Win teach the preceding feature of claim 31. For example, the Examiner's Answer has not even addressed the claim feature of "wherein the M1 attributes are not identical to the M attributes".

Thus, the preceding argument in the Examiner's Answer has not persuasively supported the allegation in the Examiner's Answer with respect to Win's alleged teaching of the preceding feature of claim 31.

The Examiner's Answer, page 24, lines 4 - 19 provides the following additional argumentation: "The Examiner asserts that Win discloses this claimed feature, as cited within Figure 10b, column 3, lines 7-40, *storing*, in the database an association of each resource to one or more of the roles", column 11, lines 42-64, "Personalized Menu Service constructs a personalized menu of resources showing only those resources that the user is authorized to access according to the user's profile information", column 12, lines 32-55, column 15, lines 35-52, "administrator may complete and submit the data entry form for each individual user to be defined".... Also, within column 3, lines 7-25, "the receiving step further comprises the steps of *storing*, in a database accessible by the Web application server, information describing one or more roles and one or more access rights of the user that are stored in association with user identifying information, wherein the roles represent the work responsibilities carried out by the user in the enterprise, and wherein the access rights represent the kinds and levels of access privileges that are held by the user in the enterprise". The "one or more roles and one or more access rights of the user" are received and are "in association with user identifying information". The "user identifying information" being an additional subset of the Appellant's claimed "attributes" (emphasis added)

In response, Appellants assert that the preceding argument in the Examiner's Answer does not address "*receiving* a selection of M1 attributes of the L attributes in the data record, wherein the M1 attributes are not identical to the M attributes, but instead addresses "*"storing ... an association of each resource to one or more of the roles"* and "*"storing ... information describing one or more roles and one or more access rights of the user*". Appellants maintain that a teaching of *storing* information is not a teaching of *receiving* information.

Accordingly, Win does not teach the preceding feature of claim 31.

In addition with respect to claim 31, Win does not teach the feature: "storing a second virtual record in the database, wherein the second virtual record comprises the M1 attributes, and wherein the attribute information providing server performs said receiving the selection of M1 attributes and said storing the second virtual record in the database".

The Examiner's Answer, page 8, lines 16-21 argues: "Regarding claim 31, Win teaches ... storing a second virtual record in the database, wherein the second virtual record comprises the M1 attributes, and wherein the attribute information providing server performs said receiving the selection of M1 attributes and said storing the second virtual record in the database (column 3, lines 7-40, "storing, in the database an association of each resource to one or more of the roles", column 5, lines 13-20, column 11, lines 42-64, column 12, lines 32-55 and column 15, lines 35-52)."

In response, Appellants note that the Examiner's Answer has not specifically identified in Win: the virtual record, the second virtual record as contrasted with the virtual record, the M1 attributes the L attributes in the data record, and the attribute information providing server. Therefore, the argument in the Examiner's Answer is vague and unclear.

Moreover, the Examiner's Answer has not provided any analysis to demonstrate the preceding citations Win teach the preceding feature of claim 31

In addition, the Examiner's Answer has not even considered the limitation of "wherein the attribute information providing server performs said receiving the selection of M1 attributes and said storing the second virtual record in the database".

Thus, the preceding argument in the Examiner's Answer has not persuasively supported the allegation in the Examiner's Answer with respect to Win's alleged teaching of the preceding feature of claim 31.

The Examiner's Answer, page 25, lines 3 - 13 provides the following additional argumentation: "The Examiner asserts that Win discloses said "storing a second virtual record in the database" as cited within column 3, lines 7-40, "storing, in the database an association of each resource to one or more of the roles", column 5, lines 13-20, "central repository", column 12, lines 32-55, "Registry Repository 110 is the primary data store for the system 2. It contains data on Users, Resources, and Roles and configuration information required for the system 2 to function. Selected data, for example, passwords, are stored in Registry Repository 110 in encrypted form" and column 15, lines 35-52, "An administrator may complete and submit the data entry form for each individual user to be defined. In response, Registry Server 108 stores information defining the user in the Registry Repository 110." The claimed "database" is sufficiently disclosed by the, inter alia, "Registry Repository" of Win.".

In response, Appellant asserts that the preceding argument in the Examiner's Answer does not address the requirement in claim 31 that "the attribute information providing server performs said receiving the selection of M1 attributes".

Accordingly, Win does not teach the preceding feature of claim 31.

Claim 32

Since claim 32 depends from claim 23, which Appellants have argued *supra* to not be anticipated by Win under 35 U.S.C. §102(e), Appellants maintain that claim 32 is likewise not anticipated by Win under 35 U.S.C. §102(e).

In addition with respect to claim 32, Win does not teach the feature: “wherein the data record comprises a globally-unique ID (GID) serving as a primary key of the data record, wherein the VID is a primary key of the virtual record, and wherein the VID is independent of the GID”.

The Examiner’s Answer, page 9, lines 1-5 argues: “Regarding claim 32, Win teaches wherein the data record comprises a globally-unique ID (GID) serving as a primary key of the data record, wherein the VID is a primary key of the virtual record, and wherein the VID is independent of the GID (Figures 10a-10c, column 12, lines 32-55, column 15, lines 35-52 and column 16, lines 13-58).”

In response, Applicants note that the Examiner’s Answer has not specifically identified in Win: the data record, the virtual record, the GID, and the VID. Therefore, the argument in the Examiner’s Answer is vague and unclear.

Moreover, the Examiner’s Answer has not provided any analysis to demonstrate the preceding citations in Win teach the preceding feature of claim 32. In particular, the Examiner’s Answer has not explained how the preceding citations Win teach that: the GID serves as a primary key of the data record; the VID serves as a primary key of the virtual record, and the VID is independent of the GID.

Thus, the preceding argument in the Examiner's Answer has not persuasively supported the allegation in the Examiner's Answer with respect to Win's alleged teaching of the preceding feature of claim 32.

The Examiner's Answer, page 25, lines 16 - 18 provides the following additional argumentation: "The Examiner asserts that Win discloses the claimed invention as cited within, but not limited to column 12, lines 32-55, column 15, lines 35-52 and column 16, lines 13-58, "Administrative Privilege value"."

In response, Appellants assert that the preceding argument in the Examiner's Answer is not relevant to the preceding feature of claim 32.

Accordingly, Win does not teach the preceding feature of claim 32.

GROUND OF REJECTION 2

Claim 26 stands rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Win as applied to claim 23, as cited above, and further in view of United States Patent No. 6,834,272 to Naor et al., hereinafter Naor.

Since claim 26 depends from claim 23, which Applicants have argued *supra* to not be anticipated by Win under 35 U.S.C. §102(3), Applicants maintain that claim 26 is likewise not unpatentable over Win in view of Naor under 35 U.S.C. §103(a).

In addition with respect to claim 26, Win in view of Naor does not disclose the feature: “wherein said providing the virtual record to the attribute information receiving apparatus is performed using a 1-out-of-N OT (Oblivious Transfer) protocol”.

The Examiner’s Answer, page 10, lines 7-11 argues: “Regarding claim 26, Naor teaches wherein said providing the virtual record to the attribute information receiving apparatus is performed using a 1-out-of-N OT (Oblivious Transfer) protocol (Figures 5 and 7, column 11, lines 30-67, column 12, lines 1-3 and 34-44, column 13, lines 42-55, column 17, lines 35-66 and column 19, lines 52-64)”.

In response, Appellants respectfully contend that the preceding argument in the Examiner’s Answer does not provide motivation for modifying Win by the alleged teaching of Naor and thus does not establish a *prima facie* case of obviousness in relation to claim 26.

The Examiner’s Answer, page 25, line 19 - page 26, line 16 provides the additional argumentation, but again does not provide motivation for modifying Win by the alleged teaching of Naor and thus does not establish a *prima facie* case of obviousness in relation to claim 26.

Accordingly, the preceding feature of claim 26 is not unpatentable over Win in view of Naor under 35 U.S.C. §103(a).

SUMMARY

In summary, Appellants respectfully requests reversal of the June 3, 2008 Office Action rejection of claims 23-32.

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